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**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA, BUTTE DIVISION**

DISABILITY RIGHTS MONTANA,
INC., on behalf of all prisoners with
serious mental illness confined to the
Montana State Prison,

) Case No. 2:15-cv-00022-SEH

Plaintiff,

**AFFIDAVIT UNDER
PENALTY OF PERJURY**

) vs.
vs.

MIKE BATISTA, in his official capacity
as Director of the Montana Department
of Corrections; LEROY KIRKEGARD,
in his official capacity as warden of
Montana State Prison,

Defendants.

STATE OF WISCONSIN)
)
) ss.
COUNTY OF DANE)

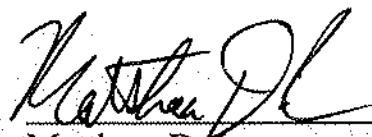
I, Matthew D. Lee, pursuant to Rule 83.1(d)(3) of the United States District Court for the District of Montana, being first duly sworn on oath, state as follows:

1. I reside in the State of Wisconsin and I am a senior counsel with the law firm of Foley & Lardner LLP located at 150 East Gilman Street, Suite 5000, Madison, Wisconsin 53703, telephone (608) 258-4203, fax (608) 258-4258, and email mdlee@foley.com. I have been an attorney with Foley & Lardner LLP since September 5, 2006.
2. With Plaintiff's Motion for Admission *Pro Hac Vice*, the appropriate admission fee was paid.
3. I am proficient in electronic filing in the United States District Court for the Western District of Wisconsin.
4. I am admitted to practice law in Wisconsin state and federal courts and the United States Court of Appeals for the Seventh Circuit.
5. I am a member in good standing of the Bar of Wisconsin, admitted on October 3, 2006. A Certificate of Good Standing is attached.
6. I am not currently suspended or disbarred in any court.
7. No disciplinary proceedings or criminal charges are currently pending against me. I have never been held in contempt, otherwise disciplined by any court

for disobedience to its rules or orders, or sanctioned under Fed. R. Civ. P. 11 or 37(b), (c), (d) or (f) or the state equivalent.

8. I have not concurrently nor within the two years preceding the date of this application made any *pro hac vice* application to this Court.

I fully understand that my *pro hac vice* admission in this Court is personal to me only and is not admission of a law firm and that I will be held fully accountable for the conduct of the litigation in this Court.



Matthew D. Lee

Subscribed and sworn to before me this
18th day of June, 2015.

Patricia M. Wright
Notary Public, State of Wisconsin
My commission expires: 4/24/17



Diane M. Fremgen
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

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CERTIFICATE OF GOOD STANDING

I, Diane M. Fremgen, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

MATTHEW D. LEE

was admitted to practice as an attorney within this state on October 3, 2006 and is presently in good standing in this court.

Dated: February 27, 2015

A handwritten signature in cursive ink that reads "Diane M. Fremgen".

DIANE M. FREMGEN
Clerk of Supreme Court